

Before the
Federal Communications Commission
Washington, D. C. 20554

In the Matter of:

EAS system)

EB Docket 04-296

EAS needs to be relegated to the same status as smoke signals and jungle drums. An interesting but ineffective system, designed to annoy the public, provide a false sense of security, frequently broken and generally as useless as asking passengers if they packed their own luggage.

The Commission asks if any of the various EAS codes should be mandatory. To that I respond with a sound NO! Certainly not until several criteria have been met.

The current system has a major fault in that those that initiate the messages have no clear standard of what is an emergency that rises to the level of necessity for a public warning over the nation's airwaves.

Another major fault is the current message initiators when issuing an alert generally use the broadest possible stroke, rather than limiting the alert to the specific area affected.

Another major fault is the message is often only verbal, while the text crawl on TV is general in nature from a pre-programmed set of messages that does not allow modification to specific areas. A classic example was an Oregon evacuation EVI message

that was sent out for an entire county when the area affected was in fact a few blocks.

This is unnecessarily alarming the public, “crying wolf” because only a few dozen people were affected, not 800,000 people in the whole county. Yet the EAS system alerted the entire area to evacuate the county, because the EAS system has no intelligence. To refer to a popular movie “War Games” “the fate of the world rested with a silicon diode” and the computer system became the decision maker, not the intelligent people who should have been interpreting the information.

EAS is a mini version of WOPR (from War Games) with no intelligent input, no intelligent output, and no intelligent control. There are no safeguards, no checks and balances, no intervention by knowledgeable trained people. It is a robotic system with the true computer personality of garbage in, garbage out.

For any public warning system to be effective, those entrusted with initiating the alert have to be trained, to meet standards, to be able to make intelligent choices consistently, and when necessary, intervene and cancel or refuse to relay messages that are either bogus, inapplicable or outdated. This in itself eliminates any computerized robotic relay exchange system that is the EAS of today. With a huge number of radio and TV stations being nothing more than relay outlets for satellite delivered materials with some locally injected interstitials, or network clones, rebroadcasting relayed materials, often state wide and beyond each without local human control to input the intelligence to decide if the EAS message is in fact valid, pertinent to the area served, and timely, EAS today is a worthless collection of quaint radio equipment and noise makers. Consider a state long chain of satellite TV stations in Nebraska, or other areas where a primary station in the major market, is simply retransmitted from site to site to cover a vast

expanse of geography, sending an EAS alert for a tornado watch or warning in Omaha, that is then retransmitted state wide is silly. The reverse, sending a Great Bend area tornado alert to Omaha is equally as invalid. Because the Government's policies of expanded competition and the thus shrinking revenues of broadcasters, many area of the country are now left with little or no local service, only the relayed signals from distant cities via satellite (DBS) retransmissions (over the air retransmission) cable TV or other means. Thus any mandatory transmission requirement is not a public service, it is a public disservice. The public is already tired of the terrorist alert level color scheme. It is being ignored completely. Few if any of the public would even be able to express what a yellow alert level actually means vs. an orange or other color. Like EAS, it is a bureaucratic panacea to falsely make the public think either we are safe, or someone is actually on guard.

If the Oregon EVI signal had been sent in New York City, imagine the panic and deaths caused by millions trying to flee Manhattan! It takes hours just to move a few miles in normal Friday night NYC "evacuation" as people leave for a weekend. Not multiply that by 100 or more and it is obvious no one would escape for days because of grid lock. Thus an EVI mandatory signal would serve no use in any metropolitan area simply because the infrastructure cannot accommodate any mass exodus. One only need look at news footage of the evacuations in Louisiana and Florida from the 2004 hurricanes to realize the futility of any EVI alert for any significant area. In sparsely populated areas evacuation of a town or part of a county may be possible, but only if the EVI alert is sent with enough specific information to inform the public where to leave,

and where it is safe to go to. Even then public safety officials would have to direct traffic to prevent delays and grid lock on the few roads that traverse the great open spaces.

An EVI or any other alert requiring immediate action must be thoroughly limited to only the area affected, and be timely enough to even allow reaction. And in any system, there must be intelligent intervention possible to insure any alerts are not sent that are not specific and limited in scope. If the public receives interruptions that do not pertain to them, the public will soon “tune out” of any alert as “just another alert for someone else.”

In conclusion, it is unwise to make any alert mandatory until a secure system with intelligent control and trained initiators is in place and there is also a set of checks in place to prevent Chicken Little from screaming “The Sky is Falling” based on whim, bad or missing information, as a prank or deliberate deception. Therefore no alert message should be mandatory.

EAS: the least effective way to send anything. Get rid of it.

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